

206-343-8800 1-800-552-3565 Fax: 206-343-7522

Notice of Violation

Registration No.: 11339

No. 36739

Date of Violation: December 06, 2000

at: 1:00 pm

Certified Mail No. 7099 3220 0005 4517 0615

Name: Ash Grove Cement Co.	Responsible Person, Title: Henrik Voldbaek Plant Manager		
Location of Violation (Address): 7 So. Nevada St.	City: Seattle	Zip: 98134	County: King
Mailing Address: 3801 E. Marginal Way So.	City, State: Seattle, WA.	Zip: 98134	Phone: 206 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:
Regulation I of the Puget Sound Clean Air Agency for:

- ☒ Section 9.11(a) Emission of an air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant, or animal life, or property, or which unreasonably interferes with the enjoyment of life and property.

FACTS ALLEGED TO CONSTITUTE A VIOLATION

Causing or allowing the emission of portland cement clinker particles in sufficient quantities and of such characteristics and duration as to unreasonably interfere with the enjoyment of life and property at 7 So. Nevada St. in Seattle, Washington. Causing or allowing portland cement clinker particle deposition on a Dodge Stratus License No. 729-JDI and a white Chevy Corsica License No. 687-EWX.

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:



626880

Signed By [Signature] Date/Time 12-15-00 Received By _____

Air Pollution Inspector

Date / Time

Signing this Notice is not an admission of guilt

Form No. 70-119b (Updated 7/00 Iss)

AGCS2M001091

RGB

ROUTING LIST:	1. MM	2. MAM 12/15/00	3. VJD	4. CF
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CASE #:	2000500881-1	<input type="checkbox"/> SMOKE	<input type="checkbox"/> ODOR	<input type="checkbox"/> FIRE	<input checked="" type="checkbox"/> DUST/FALLOUT	<input type="checkbox"/> WD STOVE	<input type="checkbox"/> ASBESTOS	<input type="checkbox"/> OTHER
TYPE:	2	MATERIAL:	COUNTY: King		DATE REC'D:	12/06/00	TIME REC'D:	10:20
LOCATION:	7 So. Nevada St.				CITY:	Seattle	ZIP:	98134
OPERATORS' INITIALS:	INSPECTOR ASSIGNED:	EMG	INSPECTION TIME:	12:00 pm	INSPECTION DATE:	12/06/00	INF:	

CONTRACTOR #:	NAME:		
SOURCE #:	R#11339	NAME:	Ash Grove Cement Co
STREET:	3801 E. Marginal Way So.	CITY:	Seattle
MAIL:	As Above	CITY:	Seattle
RESPERS:	Gerry Brown	TITLE:	Manager
		PHONE:	206 623-5596 ext 221

ASBESTOS INSP LEVEL:	<input type="checkbox"/> 0 OFF SITE	<input type="checkbox"/> 1 PRE RMVL	<input type="checkbox"/> 2 POST RMVL	<input type="checkbox"/> 3 ACTV RMVL	CAT#:	TYPE:
GENERAL INSP LEVEL:	<input type="checkbox"/> 1 OFF SITE	<input checked="" type="checkbox"/> 2 COMPLIANCE	<input checked="" type="checkbox"/> 3 MEASUREMENTS	<input type="checkbox"/> 4 SOURCE TEST		
SUMMARY REPORT:	On Site Complaint Investigation. Fallout Sample obtained. Photos taken					

INSPECTION REPORT

At 10:30 am on 12/06/00 Control I informed me by radio of a complaint registered with the Agency on 12/06/00 at 10:20 am. The complaint was registered by Chuck Morris with US Customs. At 11:30 am on 12/06/00, I contacted Mr. Morris by phone. He informed me that when he arrived at work this morning, he observed fallout on several of the US Custom's cars parked in the west parking lot on 7 So. Nevada St. I advised Mr. Morris that Inspector McAfee and I would respond on site to the complaint and that we would take samples of the fallout if possible. At 11:50 am I contacted Gerry Brown of Ash Grove Cement Co. by phone. I advised him of the fallout complaint and requested that he meet us on site at US Customs to evaluate the fallout complaint.

Meeting with complainants

At 12:00 pm on 12/06/00, Inspector McAfee and I arrived on site at 7 So. Nevada St. in Seattle. We contacted Larry Adkins, Chief Inspector with the US Customs, and Chuck Morris, Inspector with US Customs. Mr. Adkins provided us with the following information: At 5:20 pm, on 12/05/00, as he was leaving the US Customs office, he observed a light brown colored plume coming from below the main stack. The emissions were coming from an area near the main stack, but close to the ground level. The plume traveled southwest from Ash Grove towards US Customs..He stated that he thought the wind was out of the North East based on the direction the plume was traveling. He observed the plume traveling south, over the west portion of the P.O.S. terminal 106 building. (over the doors marked "15" and "16"). As he walked west along 7 So. Nevada St. towards the parking lot, he stated that he felt dust in his eyes from the Ash Grove dust plume. He informed us that the dust was bothering his eyes. He informed us that it was dark outside at 5:20 pm when he walked out of the office. With the lighting from the parking lot, he observed the dust plume coming from Ash Grove. He informed us that as he was driving his car from So Nevada St. to E. Marginal Way So at 5:29 pm on 12/05/00, the dust cloud had dissipated and it was no longer visible.

Inspector McAfee and I, accompanied by Mr. Adkins and Mr. Morris walked west along So. Nevada St. to observe the fallout on the cars in the US Customs parking lot. Mr. Morris informed us that two of the cars parked in the lot had been washed at the car wash on 12/05/00. US Customs took the white Chevy Corsica LT License No. 687-EWX to the car wash at 11:36 am on 12/05/00 and then drove it back to the US Customs parking lot on the same afternoon. US Customs also took the gray Dodge Stratus, License No. 729-JDI to the car wash on 12/05/00 at 1:08 pm and then drove it back to the US Customs parking lot on the same afternoon. Mr. Adkins explained to us that an Explorer Scout, who

INSPECTOR SIGNATURE  12/14/00

is on the payroll at US Customs, initially washes the fallout off the cars with a product called "Lime Away". Then he takes the vehicles to the car wash to complete the cleaning process. He explained that if US Customs does not clean the surfaces of the cars with Lime Away first, the car wash will not clean the cement fallout off of the cars because the fallout hardens on the cars when it is exposed to water.

At 12:10 pm, on 12/06/00, we observed a westerly wind. The flag at US customs was blowing toward the East. We observed approximately $<1/8^{\text{th}}$ of an inch of a dark gray, fine, granular, particulate on all of the horizontal surfaces of both of the cars that had been washed at the car wash the day before: The white Chevy Corsica LT WA. License No. 687-EWX and the gray Dodge Stratus, WA. License No. 729-JDI. Four or five of the other cars in the lot that had been parked in the same place over a longer period of time had a larger amount of fallout on their surfaces. The fallout that we observed was abrasive to the touch. During our on-site investigation of the fallout on the cars, we observed no visible emissions coming from the Ash Grove Cement Plant. Additionally, we observed no particulate fallout in progress during our on site investigation at US Customs.

At 12:25 pm on 12/06/00, I took frame No. 2 using film No. 3005 of the fallout on the gray Dodge Stratus, License No. 729-JDI. Mr. Morris stated that the Dodge Stratus had been parked in space No. 2 on 12/05/00 and the morning of 12/06/00. At 10:15 am, Mr. Morris moved the Dodge Stratus to space No. 16, which is where we observed the vehicle parked. It had only been driven within the parking lot to move it to space No. 16 since 12/05/00 at 5:20 pm.

At 12:30 am on 12/06/00, Gerry Brown with Ash Grove Cement Co. arrived on site at the US Customs parking lot. He explained that Ash Grove was in the process of troubleshooting a problem with the main baghouse. He stated that Ash Grove had taken one of the baghouse compartments off-line and they were conducting maintenance and cleaning on that compartment. He stated that they had also cut back on the feed to the kiln to slow the production process. He also informed us that workers and managers at Ash Grove were in the process of cleaning up inside the finish mill. Mr. Brown explained that the operators in the control room saw a spike on the opacity continuous emission monitor at 4:30 am on 12/06/00.

Sample Collection

Inspector McAfee and I agreed to obtain a bulk fallout sample from the Dodge Stratus, License No. 729-JDI and Gerry Brown agreed to obtain a bulk fallout sample from the white Chevy Corsica LT License No. 687-EWX.

I took frame No 3 at 12:31 of inspector Moris inspecting the windshield of the Dodge Stratus.

I took frame No.4 at 12:33 of Gerry Brown collecting a fallout sample from the white Chevy Corsica LT License No. 687-EWX. At 12:45 pm. I took frame No. 5 of Gerry Brown collecting a sample from the white Chevy Corsica License No. 687-EWX.

Inspector McAfee started collecting the bulk fallout sample from the Chevy Corsica LT License No. 729-JDI at 12:45 pm. She finished collecting the sample at 1:00pm on 12/06/00. The sample number was MM120600-1. I took frame No 6 of Inspector Melissa McAfee collecting a fallout sample from the Dodge Stratus License No. 729-JDI at 12:45 pm.. At 12:48 pm, I took frame No. 7 of a red Oldsmobile License No. 5060BBH. At 12:50, I took frame No. 8 of a red Oldsmobile license No. G10 92216 (A Dept. of Agriculture vehicle). I observed a heavy layer of fallout on this car. I took frame No. 9 at 12:51 of inspector McAfee sampling the back of the Dodge Stratus. At 12:56 pm on 12/06/00, I took frame No. 10 of Gerry Brown holding a sample of the fallout from the white Chevy Corsica LT License No. 687-EWX. On 12/06/00 at 12:57, I took frame No. 11 of the hood of the Dodge Stratus. At 1:03pm, I took frame No. 12 of the entire parking lot with Ash Grove in the background.

After we finished sampling the vehicles and taking photographs of them, we departed from the parking lot. Gerry Brown agreed to submit a report to the Agency documenting the operational status of the plant from 5:00 pm on

INSPECTOR SIGNATURE



12/14/00

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12/05/00 through 8:00 am on 12/06/00. We walked back to the US Customs office with Mr. Adkins and Mr. Morris. I gave two blank formal statements to Mr. Adkins. He agreed to complete them and submit them to the Agency by Friday 12/08/00. We observed a green Achieva parked just north of the US Customs main office door that was covered with a layer of fallout on all of the windows and on all of the horizontal surfaces.

Wind Speed and Direction Report

I received the following wind direction report from Ken Knowles, Computer System Analyst, with the Puget Sound Clean Air Agency. Please see wind report from the Duwamish air monitoring station for the period December 5, 2000 through December 6, 2000 attached to this report as Exhibit "A". The Duwamish air monitoring station is located at 4752 E. Marginal Way So. in Seattle Washington. Please see the 1-hour average wind speed report for the period December 5, 2000 through December 6, 2000 attached to this report as Exhibit "A". Page 2 of Exhibit "A" shows the wind direction in degrees on an hourly basis for the same period of time December 5 2000 through December 6, 2000. According to these wind analysis reports, the wind speed and direction were as follows:

12/05/00 from 5:00 PM until 8:00 AM on 12/06/00, the wind direction was out of the North, North West at 0 to 6.8 miles per hour.

Distance and direction of potential sources from the complainants

The complainant's cars on which we observed fallout on 12/06/00 are located at 7 So. Nevada Street in Seattle. They are located on the western portion of the property on the south side of So. Nevada St. The Ash Grove Cement Company is located to the north and north east of the complainant's parking lot. Ash Grove Cement Company is located less than one quarter of a mile from the complainant's parking lot. The Lafarge Cement Company is located south and east of the complainant's parking lot at a distance of approximately one and one-quarter mile.

Lafarge operational status during fallout event

We obtained information about the Lafarge Cement Company regarding the status of the operations at the plant during the fallout event period: from December 5, 2000 through December 6, 2000 . Please see the Lafarge telephone use report by Inspector McAfee attached to this report as Exhibit "B". The report indicated no upsets involving a clinker cooler bypass event or an electrostatic precipitator shut down. Mr. Russ Simonson, Environmental Engineer at Lafarge confirmed with inspector McAfee by phone on 12/06/00 that Lafarge operations, including air pollution controls, were stable on December 5, 2000 through December 6, 2000.


Lafarge eliminated as potential source of fallout

We eliminated Lafarge Cement plant as a possible source of the fallout that we observed on the US Custom's cars on 9/26/00 based on the following:

- Wind direction data showing that at no time during the fallout period starting at 5:00 pm on December 5, 2000 through 8:00 am on December 6, 2000 was the wind blowing out of the South.
- Lafarge experienced no clinker cooler bypass events or any instances of the ESP being shut down during the particulate fallout period. Mr. Simonson, Environmental Engineer at the plant states that these are the only two events that result in particulate fallout emissions from the Lafarge cement plant.
- Lafarge is located a greater distance from the complainants: approximately one and one-quarter mile. Winds from out of the North could not transport the heavy, gritty, material for long distances (over a mile).

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- First hand visual observation of the emission plume traveling from Ash Grove over the US Customs parking lot by Chief Inspector Adkins

Ash Grove Status of operations per Ash Grove Report

At 10:45 am on 12/07/00, I contacted Gerry Brown at Ash Grove by phone. I requested the daily production operation logs and the supervisor log sheets for the period December 5 2000 at 5:00 pm through December 6, 2000 at 8:00 am. I also requested a written report from Mr. Brown regarding the operations of the cement plant during that period. Mr. Brown agreed to submit the information to the Agency by Monday 12/10/00.

On 12/12/00, Gerry Brown faxed the 12/05/00 daily production log sheet and the millsupervisor's log sheet for that day. Mr Brown informed me that no one fillout the logs for 12/06/00. The 12/05/00 log indicates that The production log sheet indicates that at 8:36 pm the raw mill went down due to a belt slippage problem. There were several minutes of heavy dust while the source was trying to correct the problem, according to the log. The emissions may or may not have contributed to the fallout that we observed off-site at US Customs on 12/06/00.

Inspector McAfee signed the chain of custody for the bulk fallout sample collected on 12/06/00 . On 12/06/00 she relinquished control of the sample to Neal Shulman, inspection department manager, as documented on the chain of custody form. Mr. Shulman secured the sample in the Agency custody locker.

Basis for Issuing Regulation I Section 9.11(a) NOV to Ash Grove Cement Co.

1. Formal Statement from Chief Inspector Adkins and Inspector Moris. Mr. Adkin's statement was dated 12/06/00 and it was received by this Agency on 12/11/00. Mr. Moris's statement was dated 12/07/00 and it was received by this Agency on 12/11/00. The statements document impacts to property. In his written statement, Mr. Adkin's describes his first hand observations of an emission plume traveling from Ash Grove to the US Customs parking lot.
2. Visual verification of the fallout and impacts to property was made by myself and inspector McAfee on 12/06/00 in response to a complaint
3. Wind direction data indicates prevailing winds out of the North, North West. This would put the impacted cars directly downwind of the Ash Grove Cement Co. which operated less than ¼ mile away.
4. Source of fallout has been identified as Ash Grove Cement Co.
 Sample analysis (has not been sent to CTL for analysis yet)
 Photographs document fallout (not developed yet)
 Wind direction has been obtained
 Process emission data showing Ash Grove


RECOMMENDATION:	<input type="checkbox"/> CLOSE CASE	<input type="checkbox"/> DEFICIENCY LETTER	<input type="checkbox"/> F/U INSPECTION	<input type="checkbox"/> DATE:
	<input type="checkbox"/> AOD	<input type="checkbox"/> OFFICE CONFERENCE	<input type="checkbox"/> CIVIL PENALTY	<input type="checkbox"/> AMOUNT:
NOV #/SECTION:	<input type="checkbox"/> OTHER ACTION			FILM No: 3005

INSPECTOR SIGNATURE *CS* 12/14/00

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COMPLAINANT:	<input checked="" type="checkbox"/> IN PROGRESS	<input checked="" type="checkbox"/> IMPACTING COMPLAINANT	<input checked="" type="checkbox"/> SIGN FORMAL COMPLAINT
NAME:	Chuck Morris US Customs		
STREET:	7 So. Nevada St.	CITY:	Seattle
		ZIP:	98134
HOME PHONE:	WORK PHONE:	COMPLAINANT ADVISED:	
	206 553-1589	Yes in person 12/06	
COMMENTS:	17:00 last night Ash Grove began operations. By 17:20 full blown. Lots of dust all over cars. Evidence is there this AM.		

 12/14/06

Wind Speed

Puget Sound Clean Air Agency

December 2000

Duwamish, 4752 E Marginal Way S, Seattle, Wa

1 Hour Averages

Sampling Method: RM Young 05305 Wind Monitor AQ

Units are: Miles per Hour

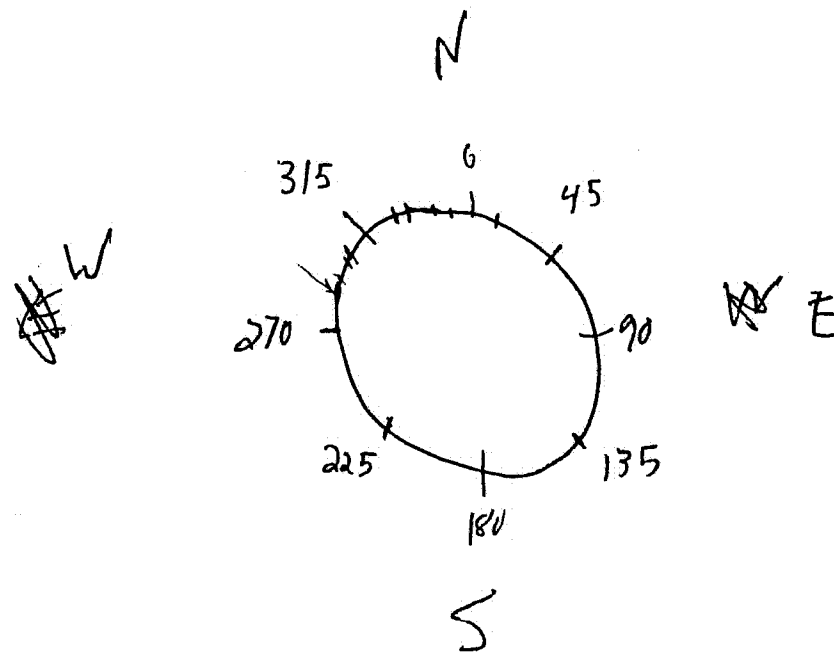
Date	Hour PST																								Daily Mean
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
Fri 1	.9	1.3	4.5	5.3	4.2	4.8	3.8	2.8	2.5	3.9	6.4	5.2	5.7	4.0	2.5	1.8	2.3	2.1	2.6	1.4	1.7	5.6	6.0	3.9	3.6
Sat 2	1.5	1.6	2.2	3.4	4.3	7.8	8.7	3.1	3.9	7.0	4.7	5.5	5.7	4.2	3.9	1.5	1.3	.5	.6	.6	1.1	.8	.2	.2	3.1
Sun 3	.3	.7	1.3	1.0	2.1	2.6	.7	.8	.9	2.7	5.7	7.1	8.1	7.9	8.1	5.8	6.5	7.1	3.3	4.1	3.3	4.3	4.6	3.6	3.9
Mon 4	2.1	2.9	3.2	3.1	2.3	2.7	1.6	1.2	2.8	5.0	4.2	3.0	4.0	6.0	5.3	5.2	4.3	3.2	4.8	5.1	3.7	3.2	3.5	3.7	3.6
Tue 5	1.9	1.7	2.3	2.7	3.2	2.8	3.0	1.9	5.2	5.1	5.8	6.9	6.2	6.1	4.2	4.6	4.1	6.8	5.6	1.7	.2	1.1	.6	.5	3.5
Wed 6	.9	2.1	.8	1.4	3.0	1.6	1.0	.6	.9	2.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Monthly Hour Mean	1.3	1.7	2.4	2.8	3.2	3.7	3.1	1.7	2.7	4.3	5.4	5.5	5.9	5.6	4.8	3.8	3.7	3.9	3.4	2.6	2.0	3.0	3.0	2.4	
Monthly Hour Max	2.1	2.9	4.5	5.3	4.3	7.8	8.7	3.1	5.2	7.0	6.4	7.1	8.1	7.9	8.1	5.8	6.5	7.1	5.6	5.1	3.7	5.6	6.0	3.9	

Monthly Mean = 3.4

Total Observations = 130

Monthly Maximum = 8.7

Note: A dash alone (-) indicates missing data or fewer than 18 values for a Daily Mean



Wind Direction

Duwamish, 4752 E Marginal Way S, Seattle, Wa

Puget Sound Clean Air Agency

1 Hour Averages

December 2000

Sampling Method: RM Young 05305 Wind Monitor AQ

Units are: Degrees

Date	Hour PST																								Daily Mean
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
Fri 1	323	167	173	165	151	173	193	148	146	139	154	145	166	174	308	311	160	179	288	338	158	162	160	210	174
Sat 2	5	190	146	173	149	170	186	191	183	180	200	201	192	193	182	203	207	282	246	270	133	161	202	255	194
Sun 3	296	204	338	321	356	5	260	350	189	52	25	16	352	353	13	19	17	8	12	22	25	22	14	11	1
Mon 4	354	6	348	360	15	6	37	255	353	340	319	330	317	325	323	323	329	335	358	13	25	19	26	20	350
Tue 5	7	24	39	14	28	23	33	62	17	9	356	5	350	355	324	328	344	16	14	350	279	308	289	297	358
Wed 6	340	342	338	337	339	31	328	285	22	345	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Monthly																									
Hour Mean	341	265	11	347	32	38	296	247	86	30	346	4	308	313	321	320	327	335	333	346	70	43	318	304	

Total Observations = 130

Note: A dash alone (-) indicates missing data or fewer than 18 values for a Daily Mean

Case#

DEC 11 2000

Formal Statement

Name of Source: Larry H. Adkins

Address of Source: U.S. Customs Service, 7 S. Nevada St., Suite 100, Seattle, WA 98134

City: Seattle

County: King

Zip: 98134

Describe the problem in your own words; what type of pollution (i.e., dust, smoke, odor, etc.), where it is coming from and who do you think is responsible for causing or allowing the pollution. Describe any distress or ill effects caused by the pollution, and attach any physical evidence that you have, including: photographs, videotapes, receipts or estimates for repairs, doctor bills, etc. Attach additional sheets if necessary.

On Tuesday, December 5, 2000, I walked out of my office at 7 S. Nevada Street, Seattle, WA 98134, at 5:20 P.M. As I started to the fenced parking area where my vehicle was parked I noticed a large cloud of dust coming from the Ash Grove Cement plant. The cloud of dust appeared to be emanating from the ground level, not the smokestack, and came over the Terminal 106 building at about door #15 and across our parking lot area. The wind was in a southwesterly direction coming out of the northeast. As I walked toward the parking lot the cloud of dust was drifting to the southwest.

As I got to the gate area of our parking lot I began to smell the dust and could feel the dust affecting my eyes. I walked over to the west side of the roadway at the west end of our parking lot in an attempt to see exactly what was causing all the dust but I could not get a good visual. I gave up because the dust was bothering my eyes. At that time I went to my vehicle and departed. By the time I drove to the stop light at Marginal Way and Utah Street (approximately 5:29 P.M.) I looked back toward the area of the Ash Grove Cement plant and could no longer see the cloud of dust. When I got home I ran my hand over my vehicle and found that it was covered with dust. My vehicle had been washed and waxed on the previous Saturday.

On December 6, 2000, at approximately 9:10 A.M., I drove into our parking lot at 7 S. Nevada Street, Seattle, WA. and noticed that all of the government vehicles were covered with dust. This included three vehicles that were washed the previous day, December 5, 2000. One of our part-time employees had hand washed the vehicles using a lime and calcium removing solution and then taken the vehicles to Elephant Car Wash for a wash and wax. Total cost for cleaning these three vehicles on 12/05/00 was approximately \$50 dollars, which includes the hours worked by the part-time employee.

When I arrived at my office I instructed Senior Inspector Charles Moris to contact Puget Sound Air Pollution control and lodge a complaint. I also advised him to call Jerry Brown at Ash Grove Cement Company and advise him that we had witnessed a fallout.

Your Name: Larry H. Adkins

Address: U.S. Customs Service, 7 S. Nevada Street, Suite 100


City: Seattle

County: King

Zip: 98134

Signing this form releases the Puget Sound Air Pollution Control Agency from any responsibility to protect your anonymity and may require your testimony.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:


Signature

12/06/00 7 S. Nevada St., Seattle, WA 98134
Date and Place

DODGE STRATUS

729-JDI

ELEPHANT CAR WASH
2763 4TH AVENUE SOUTH
SEATTLE, WA 98134

TUESDAY, DECEMBER 05, 2000 @ 01:06P

MERCHANT ID . . . : 00183814000201
CARD NUMBER . . . : A7000069900100016350
EXPIRATION . . . : 0110
ODOMETER . . . : 0012002
INVOICE NUM . . . : 105092
TOTAL . . . : 8.15
AUTH CODE . . . : APPROV 905076

PRODUCT CODE . . : 34 CAR WASH
PRODUCT AMOUNT . : 8.15

G10 99552

RETAIN THIS COPY FOR YOUR RECORDS
TOP COPY-MERCHANT BOTTOM COPY-CUSTOMER

WHITE CORSKA
6087-EWX.

ELEPHANT CAR WASH
2763 4TH AVE SO
SEATTLE WA 98134

DATE: 12/05/00
MERH: 000000020032 TERM: 0001

S-A-L-E-S D-R-A-F-T

REF: 0015 BCH: 299
CD TYPE: MC
TR TYPE: PR
AMOUNT: \$8.15

ACCT: 5568760000219354 EXP: 0702
AP: 069470
NAME: 161LT53T0PY210693

TRAN ID: 1205MCFMS0697 AUDIT: AH500
VALD CD:

I AGREE TO PAY ABOVE TOTAL AMOUNT
ACCORDING TO CARD ISSUER AGREEMENT
(MERCHANT AGREEMENT IF CREDIT VOUCHER)

X 
TOP COPY-MERCHANT BOTTOM COPY-CUSTOMER



GREEN
OLDS

989

ELEPHANT CAR WASH
2763 4TH AVENUE SOUTH
SEATTLE, WA 98134

TUESDAY, DECEMBER 05, 2000 @ 12:13P

MERCHANT ID . . . : 00183814000201
CARD NUMBER . . . : 07000069900100016142
EXPIRATION . . . : 1001
ODOMETER . . . : 0018766
INVOICE NUM . . . : 104970
TOTAL . . . : 8.15
AUTH CODE . . . : APPROV 09777E

PRODUCT CODE . . : 34 CAR WASH
PRODUCT AMOUNT . : 8.15

X 
SIGNATURE

RETAIN THIS COPY FOR YOUR RECORDS
TOP COPY-MERCHANT BOTTOM COPY-CUSTOMER

Case#

Formal Statement

DEC 11 2000

Name of Source: Ash Grove Cement
Address of Source: 3801 E Marginal Way S
City: Seattle, WA 98134 County: King Zip:

Describe the problem in your own words; what type of pollution (i.e., dust, smoke, odor, etc.), where it is coming from and who do you think is responsible for causing or allowing the pollution. Describe any distress or ill effects caused by the pollution, and attach any physical evidence that you have, including: photographs, videotapes, receipts or estimates for repairs, doctor bills, etc. Attach additional sheets if necessary.

Please see attached statement dated 6 Dec 00

Your Name: SI Chuck Moris (for U. S. Customs)
Address: 7 S Nevada St
City: Seattle, WA 98134 State: Zip:

Signing this form releases the Puget Sound Air Pollution Control Agency from any responsibility to protect your anonymity and may require your testimony.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:


Signature

7 December 2000
Seattle, WA

Date and Place

**Formal Statement to Puget Sound Air Pollution Control Agency
for the fallout that was reported
Wednesday, 6 December 2000**

SI Chuck Moris (for)
U. S. Customs
7 South Nevada Street
Seattle, WA 98134

On Tuesday evening, 5 December 2000, I left work at 1700. As I left the office and was walking to the fenced parking lot at the West end of South Nevada Street, the sky was clear and I did not notice any "fallout" on my personal vehicle.

On Wednesday morning, 6 December, Chief Larry Adkins told me that when he left the office the night before at 1720, there was a whitish/grey cloud (that looked similar to fog) hanging over our fenced parking lot. By the time he reached the parking lot the cloud was starting to move westerly towards the river but there was still enough in the air that his eyes were hurting. He mentioned that he walked to the west end of the Port of Seattle warehouse (on the north side of South Nevada Street) and could see that the "fallout" was not coming out of the stacks at Ash Grove Cement but from lower down. He was unable to see the exact source of the cloud.

On Tuesday, 5 December 2000, three of our government vehicles were washed. We had a part time employee first clean the vehicles with a "lime away" cleaner and then had them run through Elephant Car Wash. U.S. Customs spent \$8.15 per vehicle at Elephant Car Wash plus the cost of the cleaner and the time of our employee to clean the vehicles and have them washed. On Wednesday morning, after the "fallout", the vehicles looked like they hadn't been touched. These vehicles plus all the other government vehicles will have to be cleaned with the "lime away" product and washed or taken to a detail shop for cleaning. We normally have about 14 government vehicles parked in this lot over night.

At 1025 on 6 December 2000 the fallout was reported to PSAPCA and to Jerry Brown from Ash Grove Cement. Between 1145 and 1300 on 6 December, Melissa McAfee and Elizabeth Gilpin from PSAPCA and Jerry Brown came, took pictures and samples. Jerry Brown stated that he would "check into it" from his end and possibly send his sample to a lab for analysis.

Even though we are located in a light industrial area, the continued fallout/dustings that U.S. Customs is experiencing is over and above what any business would reasonably expect.

Under normal day to day operations, we wash our vehicles about once a month. At this location, for safety reasons, we are forced to wash our vehicles weekly. The grey/white substance that accumulates on the vehicles works like an acid pitting and clouding the windows and paint. Plus, we have these extra heavy "fallouts/dustings" where a normal washing, or use of an ice scraper, will not remove the crystallized fallout. Without the weekly washings, the vehicle windows become so "foggy" and the sun glare so bad, that the driver can not see out the windows. We are also forced to commit hundreds of man hours to the weekly washings, and to the delivery and pickup of the vehicles from the detail shops.

DODGE STRATUS

729-JDI

ELEPHANT CAR WASH
2763 4TH AVENUE SOUTH
SEATTLE, WA 98134

TUESDAY, DECEMBER 05, 2000 @ 01:06P

MERCHANT ID . . . : 00183814000201
CARD NUMBER . . . : A7088869900100016350
EXPIRATION . . . : 0110
ODOMETER . . . : 0012002
INVOICE NUM . . . : 105092
TOTAL . . . : 8.15
AUTH CODE . . . : APPROV 905076

PRODUCT CODE . . : 34 CAR WASH
PRODUCT AMOUNT . . : 8.15

X *Min Jang*
610 99552

RETAIN THIS COPY FOR YOUR RECORDS
TOP COPY-MERCHANT BOTTOM COPY-CUSTOMER

WHITE CORSKA
687-EWX

ELEPHANT CAR WASH
2763 4TH AVE SO
SEATTLE WA 98134

DATE: 12/05/00
MER#: 000000020832 TERM: 0001

S-A-L-E-S D-R-A-F-T

REF: 0015 BCH: 299
CD TYPE: MC
TR TYPE: PR
AMOUNT: \$8.15

ACCT: 5568760000219354 EXP: 0702
AP: 069470
NAME: 1G1LT53T0PY210693

TRAN ID: 1205MCFMS8697 AUDIT: AH500
VALD CD:

I AGREE TO PAY ABOVE TOTAL AMOUNT
ACCORDING TO CARD ISSUER AGREEMENT
(MERCHANT AGREEMENT IF CREDIT VOUCHER)

X *Min Jang*
TOP COPY-MERCHANT BOTTOM COPY-CUSTOMER



GREEN
CILT

209

ELEPHANT CAR WASH
2763 4TH AVENUE SOUTH
SEATTLE, WA 98134

TUESDAY, DECEMBER 05, 2000 @ 12:13P

MERCHANT ID . . . : 00183814000201
CARD NUMBER . . . : 07088869900100013142
EXPIRATION . . . : 1001
ODOMETER . . . : 0018766
INVOICE NUM . . . : 104972
TOTAL . . . : 8.15
AUTH CODE . . . : APPROV 09777E

PRODUCT CODE . . : 34 CAR WASH
PRODUCT AMOUNT . . : 8.15

X *Min Jang*
SIGNATURE

RETAIN THIS COPY FOR YOUR RECORDS
TOP COPY-MERCHANT BOTTOM COPY-CUSTOMER

WHITE C. V. 504-
087-0000

A clean car is a happy car!



12/5/00

ELEPHANT CAR WASH
FOURTH & LANDER
11:36am
CAR# 50 SLSMNH

Exterior Wash
SALES TAX:

TOTAL \$:
Credit Card

THANK YOU
PLEASE
COME AGAIN
DRIVE SAFE
SAVE YOUR RECEIPT
TO CLAIM YOUR

MCST: 3300100000210007
AP: 069470
NAME: 161LT53T8PY218693
TRAN ID: 1205MCFMS0697
AUDIT: AN503
VALD CD:

I AGREE TO PAY ABOVE TOTAL AMOUNT
ACCORDING TO CARD ISSUER AGREEMENT
(MERCHANT AGREEMENT IF CREDIT VOUCHER)

AGCS2M001105

TOP COPY-MERCHANT BOTTOM COPY-CUSTOMER

A clean car is a happy car!



ELEPHANT CAR WASH
FOURTH & LANDER
12:17pm
CAR# 61 SLSMNH

Exterior Wash
SALES TAX:

TOTAL \$:
Voyager

THANK YOU
PLEASE
COME AGAIN
DRIVE SAFE
SAVE YOUR RECEIPT
TO CLAIM YOUR

12/5/00

ELEPHANT CAR WASH
FOURTH & LANDER
1:08pm
CAR# 85 SLSMNH

Exterior Wash
SALES TAX:

TOTAL \$:

shows times
vehicles were
washed

MAR 22 2001

AIR AGENCY

Client: Puget Sound Clean Air Agency
Project: Dust fallout analysis
Contact: Fred L. Austin
Submitter: Fred L. Austin

CTL Project No.: 153660
CTL Proj. Mgr.: Ron Sturm
Analyst: Ron Sturm
Approved: [Signature]
Date: 01-Mar-2001

REPORT OF LABORATORY ANALYSIS

Two powder samples, each provided in a small glass jar, were received on December 13, 2000 from Mr. Fred L. Austin, Air Pollution Engineer for Puget Sound Clean Air Agency, Seattle WA. Each sample was provided with a chain-of-custody form, that was signed upon receipt. Reportedly, the powder samples represent particulate dust (fallout) settled on the exterior of several automobiles. The following sample identifications, descriptions, and locations were provided by Mr. Austin:

	<u>P.S. Clean Air Sample ID</u>	<u>Sample Description</u>
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✓ 36740	MM092600-1	Composite dust sample from following two vehicles at US Customs, Seattle; (1) White Ford Taurus License No. T-23051 and (2) Red Oldsmobile License No. 506-BBH
Nov 36739	MM120600-1	Dust sample from single vehicle at US Customs, Seattle; (1) Grey Dodge Stratus License No. 729 DJI

Laboratory analysis of each sample was requested by Mr. Austin to identify the constituents of the dust fallout. Analyses consisted of X-ray diffraction analysis (XRD) and optical, polarized-light and reflected light microscopy of each sample. Prior to analysis, each sample was split into three portions, each portion given a unique CTL sample number. One split of each was not analyzed. The samples were split and identified as follows:

<u>P.S. Clean Air Sample</u>	<u>CTL Sample ID</u>	<u>Test Designated</u>
MM092600-1	318101-1	Microscopy
	318101-2	XRD
	318101-3	Not analyzed
MM120600-1	318104-1	Microscopy
	318104-2	XRD
	318104-3	Not analyzed

FINDINGS

Microscopy

The following lists provide the identified constituents, in order of relative abundance, within the referenced dust fallout tape samples, as determined by optical, microscopical examination:

<u>CTL ID</u>	<u>P. S. Clean Air ID No.</u>
318101-1	MM092600-1

Predominant Constituent¹

- Unhydrated portland cement clinker particles (Figs. 1, 2, 3, and 4): mainly small, gray grains and masses (about 30 to 200 μm across). The masses are comprised of tricalcium and dicalcium silicate (*alite* and *belite*) crystals bound in a matrix of tetracalcium aluminoferrite (*ferrite*), tricalcium aluminate, and other related compounds. Such compound assemblage and morphology is typical of hydraulic portland cement clinker. Many of the masses exhibit evidence of partial hydration (reaction with water), resulting in formation of secondary hydration products and related carbonated compounds, the latter forming carbonated hydration rims (Fig. 2).

Minor Constituents

- Miscellaneous mineral grains (10 to 150 μm) including calcite, quartz, feldspar, amphiboles, mica, opaque minerals, and other rocks and minerals (Figs 1 and 2);
- Light gray to buff colored, friable clumps and masses (some up to 150 μm across) of fully hydrated portland cement, much of which is carbonated;
- Black, elongated shards (up to 0.5 mm long) of elastic resinous material, possibly shredded rubber or plastic;
- Traces (less than 1% each) of paper, plant, and synthetic fibers, metal fragments, man-made glass (shards, fibers and spheres), and other (unidentified) particles.

¹ Predominant constituent comprises an estimated 80 to 85% of sample.

CTL ID **P. S. Clean Air ID No.**
318104-1 **MM120600-1**

Predominant Constituent²

- Unhydrated portland cement clinker particles (Figs. 5 and 6): mainly small, gray grains and masses (about 50 to 300 μm across). The masses are comprised of tricalcium and dicalcium silicate (*alite* and *belite*) crystals bound in a matrix of tetracalcium aluminoferrite (*ferrite*), tricalcium aluminate, and other related compounds. Such compound assemblage and morphology is typical of hydraulic portland cement clinker. A few masses exhibit evidence of partial hydration (reaction with water), resulting in formation of secondary hydration products (suspected hydrated alkali sulfates, calcium hydroxides, and other related compounds).

Minor Constituents

- Miscellaneous mineral grains (10 to 150 μm) including quartz, calcite, feldspar, amphiboles, mica, opaque minerals, and other rocks and minerals;
- Light gray to buff colored, friable clumps and masses of hydrated portland cement, much of which is carbonated;
- Black, elongated shards of elastic resinous material, likely shredded rubber;
- Traces (less than 1% each) of hair, paper, plant, and synthetic fibers, metal fragments, starch, insect parts, and other (unidentified) particles.

X-ray Diffraction Analysis

Findings of the x-ray-diffraction analysis are provided in the attached data sheets. These analyses are generally consistent with the findings of the optical microscopy. Each dust sample is comprised predominantly of crystalline compounds normally associated with portland cement clinker, including alite (C_3S), belite (C_2S), and ferrite (C_4AF). Small amounts of naturally occurring mineral particles, including quartz (SiO_2), calcite (CaCO_3), and kyanite (Al_2SiO_5) were also identified. Quartz and calcite are common mineral. Kyanite is less common and may represent particles of abrasive or other industrial particulate residue. Calcite is also a byproduct of carbonation of hydrated portland cement.

² Predominant constituent comprises an estimated 90% of sample.